	Case 4:08-cv-01776-CW	Document 11	Filed 07/31/2008	Page 1 of 5	
1	MARK D. PETERS (sbn11098	21)			
2	Peters & Peters 645 Fourth Street, Suite 213	1)			
3	Santa Rosa, CA 95404 (707) 545-9250				
4	Attorney for Defendant HEALDSBURG UNIFIED SCHOOL DISTRICT				
5					
6	UNITED STATES DISTRICT COURT				
7	NORTHERN DISTRICT OF CALIFORNIA				
8					
9	A.S., a minor; JUDITH SANDERSON, individually and as parent of her minor		No. C 08-01776 CW		
10	child,)1 1101 11111101	JOINT STATUS REPORT AND CASE MANAGEMENT STATEMENT		
11	Plaintiffs,		MANAODMIDITI	STATEMENT	
12	V.			gust 12, 2008 0 p.m.	
13	HEALDSBURG UNIFIED DISTRICT,	SCHOOL		o, Oakland	
14 15	Defendant.				
16	In advance of t	the Initial Case Ma	nagement Conferen	ice. the parties, through	
17		In advance of the Initial Case Management Conference, the parties, through their respective Counsel, submit their Joint Status Report and Case Management Statement.			
18	then respective counsel, such in the states report and case management statement.				
19	A. Summary c	of the claims and d	efenses:		
20	The Complaint alleges causes of action for violation of the California				
21	constitution and Sections 220 and 260 of the Education Code, and title 42 U.S.C. Section				
22	2000d, premised upon racial harassment that Plaintiff A.S. experienced at Healdsburg Junior				
23	High School, operated by Defendant Healdsburg Unified School District. Plaintiffs allege that				
24	the response by the School District was inadequate.				
25					
26					
27					
28	JOINT STATUS REPORT AND CASE MANAGEMENT STATEMENT 1				

	Case 4:08-cv-01776-	CW Document 11	1 Filed 07/31/2008	Page 2 of 5	
1	B. State	us of service on all def	Fendants and cross-defend	lants:	
2	The sole	e Defendant is the Heal	dsburg Unified School Di	strict, which has been	
3	served and has answere	ed.			
4					
5	C. Join	der of additional partic	es:		
6	It is not	anticipated that additi	onal parties will be joined	d.	
7					
8	D. Amendments to the pleadings:				
9	No ame	ndments to the pleading	ngs are presently contemp	plated.	
10					
11	E. Juris	diction and venue:			
12	Jurisdic	tion and venue are pro	oper in this Court.		
13					
14		overy plan:			
15		nges in timing for initia			
16		ties stipulated to conti	nue the time for making	Initial Disclosures to	
17	August 5, 2008.				
18					
19		ects on which discove			
20			nplaints by minor and her i	_	
21	findings and actions tal	ken in response by Sch	nool District, and damage	es.	
22	2 Char		4:	lan fadanal an lacal	
23	rules:	iges in the fimitation of	on discovery imposed und	ier lederal or local	
2425	No char	nges are anticipated.			
26					
27					
28	JOINT STATUS REPORT AND CASE MANAGEMENT STATEMENT 2				
_0	AND CASE MANAGEM	ENI SIAIEWENI	≟		

1	4. Timing of expert witness disclosures:			
2	Disclosure of expert witness information to be made 75 days prior to Trial.			
3				
4	5. Proposed Discovery Cut-Off:			
5	Discovery to cease 60 days prior to Trial.			
6				
7	6. Discovery Motion Cutoff:			
8	Discovery motions to be heard no later than 45 days prior to Trial.			
9				
10	G. Cut-off for non-discovery motions:			
11	Non-discovery motions to be heard no later than 30 days prior to Trial.			
12				
13	H. Pre-trial Conference and Trial:			
14	Plaintiff's Counsel proposes that the case will be ready for Trial, and			
15	requests that the Court set the Trial in April 2009. Defendant's Counsel is concerned that			
16	the matter may not be ready for Trial by then, and that the end of the school year and			
17	summer are traditionally difficult times for school personnel to attend Trial, and may			
18	request that the matter be set for Trial in the fall of 2009.			
19				
20	I. Estimated days of Tral:			
21	The Trial is expected to last up to ten days.			
22				
23	J. Appropriateness of Special Procedures:			
24	No special procedures are contemplated at this time.			
25				
26				
27	JOINT STATUS REPORT			
28	AND CASE MANAGEMENT STATEMENT 3			

Case 4:08-cv-01776-CW Document 11 Filed 07/31/2008 Page 3 of 5

	Case 4:08-cv-	-01776-CW	Document 1	1 F	Filed 07/31/200	8 Page 4 of 5
1		K. Proposed n	nodification of	standa	ard pre-Trial pro	cedures:
2		None.				
3						
4		L. Related cas	es:			
5		None.				
6						
7		M. Prospects i	for Settlement:	<u>!</u>		
8	The parties have stipulated to participate in the Court's Early Neutral					
9		gram and Ms. (Greta W. Schn	etzler l	has been appoint	ed to act as the
10	Evaluator.					
11						
12		N. Other matte	ers:			
13		None.				
14						
15	DATED. Inter	21 2009				
16 17	DATED: July í	31, 2008				
18				/c/ M /	ork D. Patars	
19				Mark Attor	ark D. Peters D. Peters ney for Defendar	
20				711101	ney for Berendar	10
21	DATED: July (31, 2008				
22		,		/s/ Sto	ephen J. Duggan	
23				Steph	ephen J. Duggan en J. Duggan ney for Plaintiffs	S
24						
25						
26						
27						
28	JOINT STATUS AND CASE MA	REPORT NAGEMENT ST	ATEMENT	4		

	Case 4:08-cv-01776-CW Document 11 Filed 07/31/2008 Page 5 of 5				
1	PROOF OF SERVICE				
2	I am a citizen of the United States and a resident of the County of SONOMA.				
3	I am over the age of 18 years and not a party to the within above-entitled action. My business				
4	address is 645 Fourth St., Suite 213, Santa Rosa, California 95404. On the below mentioned				
5	date, I served the JOINT STATUS REPORT AND CASE MANAGEMENT STATEMENT				
6	on the attorneys of record in said action by entering it into the ECF System accessible to				
7	opposing Counsel:				
8 9	Mr. Stephen J. Duggan 250 Healdsburg Avenue, Suite 201 Healdsburg, CA 95448				
10	I declare under penalty of perjury under the laws of the State of California that				
11	the foregoing is true and correct.				
12	Dated: July 31, 2008				
13					
14					
15	/s/ Mark D. Peters Mark D. Peters				
16	Mark D. Peters				
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27	JOINT STATUS REPORT				
28	AND CASE MANAGEMENT STATEMENT 5				